

Deaf VISA
Deaf Visitors and Immigrants for Self-Advocacy

Federal Communications Commission
445 12th Street SW
Washington D.C. 20554

*Re: In the Matter of Structure and Practices of the Video Relay Service Program;
Telecommunications Relay Services and Speech to-Speech Services for Individuals with
Hearing and Speech Disabilities---Report & Order Adopted June 7, 2013*

To Whom It May Concern:

In the Federal Communications Commission (FCC)'s recent Report & Order adopted on June 7, 2013, the FCC announces the creation and implementation of a telecommunications relay services (TRS) user registration database (URD) in order to improve registration and verification of the eligibility of Video Relay Services (VRS) users. While we understand the need for such a database to combat user fraud, we would like to express our concern regarding the TRS-URD requirement that the user provide the last four digits of his or her Social Security number (SSN).¹

Deaf Visitors and Immigrants Self-Advocacy (Deaf VISA) is a nascent organization whose purpose is to maximize the empowerment of Deaf internationals in America through education, research, self-advocacy and support, outreach, and leadership development. The aforementioned TRS-URD requirement adversely impacts visa holders (including students) who are Deaf or hard of hearing in that they do not have SSNs and therefore would not be able to establish eligibility for utilizing VRS. They would be rendered unable to communicate over the phone. The SSN requirement thus favors citizens over non-citizens in who would be eligible to use VRS services, which is inequitable.

Deaf VISA therefore requests that FCC issue an exemption for those with visas. The user's visa information could be used in place of the SSN information to establish identity, which would still accomplish the same purpose of combating user fraud.

We appreciate your attention to this matter. If you have any questions, please do not hesitate to contact us at: deafvisa@gmail.com.

Sincerely,



Laura Wickless, Chair

¹ R&O, Paragraph 70.